



1941 Bridgeville Highway, PO Box 1800

December 13, 2010

Ms. Jennifer J. Johnson, Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, N.W.  
Washington DC 20551

Re: Proposed Changes to Credit Insurance Disclosures under Regulation Z and the Truth-in-Lending Act  
Docket No. R-1390

Dear Ms. Johnson:

Sussex County Federal Credit Union (SCFCU) is a \$200 million dollar credit union located in Seaford, Delaware.

As a credit union offering a full range of products and services to best serve and protect our member's financial needs, we have concerns over the proposed amendment referenced above.

Credit insurance is a voluntary product offered by our credit union to protect our members who may not have adequate insurance coverage or alternative forms of coverage to protect their financial future and credit when they obtain additional but necessary debt.

The changes proposed in the new disclosure may discourage members from opting for the coverage thus putting their financial future at risk. While SCFCU is certainly in favor of fair, clear and accurate disclosures for our members, we do not want the disclosures to deter our members from considering and opting for this extremely beneficial coverage.

Over the years at various credit unions, I have seen this coverage in action numerous times. Following is a story I will always carry with me. A few years ago, I waited on a father who came in to discuss his son's auto loan. His 22 year old son had been killed in an accident at work. When I checked our system and saw the loan was protected with credit life insurance I was relieved and you can only imagine how thankful the father was that we offered such protection to his son and that his son was educated enough about it to purchase it. This is only one of many examples of how this coverage benefits our members.

Again, Sussex County Federal Credit Union urges the Federal Reserve to take our concerns under advisement as they consider the new disclosure and changes to Regulation Z.

Sincerely,

Sue Hoefs  
Chief Lending Officer  
Sussex County Federal Credit Union

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